

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:16-CR-60-H-2

UNITED STATES OF AMERICA

v.

RONNIE L. DAVIS

MOTION TO EXTEND THE PRETRIAL
MOTIONS DEADLINE

On May 24, 2016, Defendant Ronnie L. Davis was indicted with charges relating to fraud and payment of bribes. [DE 1.] The pretrial motions deadline is currently set for November 14, 2016, and the arraignment is currently set for the December 6, 2016 term of court. [DE 41.] On August 23, 2016, the government filed a superseding indictment, adding charges of tax fraud. [DE 32.] Discovery in this case was voluminous. In order to finalize potential pretrial motions, counsel requests an extension of the pretrial motions deadline of 14 days until November 28, 2016. Counsel has reached out to Assistant United States Attorney David Bragdon, but has not confirmed his position.

Because the ends of justice served by this motion outweigh the best interests of the public and the Defendant in a speedy trial, such period of delay resulting from this continuance shall be excluded pursuant to 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted this 14th day of November, 2016.

THOMAS P. McNAMARA
Federal Public Defender

/s/ Katherine E. Shea
KATHERINE E. SHEA
Assistant Federal Public Defender

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LR 57.1 Counsel Appointed

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

David Bragdon

U. S. Attorney's Office
Suite 800, 310 New Bern Ave.
Raleigh, NC 27601
919-856-4530
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Email: david.bragdon@usdoj.gov

by electronically filing the foregoing with the Clerk of Court on November 14, 2016, using the CM/ECF system which will send notification of such filing to the above.

This the 14th day of November, 2016.

/s/ Katherine E. Shea
KATHERINE E. SHEA
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